

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-against-

NOTICE OF MOTION
06 Cr. 352 (NGG)

VOLKAN MERGEN,

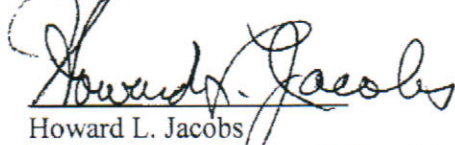
Defendant.

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MADAM:

PLEASE TAKE NOTICE, that upon the attached affidavit of Volkan Mergen, sworn to August/9, 2011 and the exhibits attached thereto the undersigned will move before the Hon. Nicholas Garufis for an order granting defendant Volkan Mergen a new trial on the basis that his trial counsel was ineffective and for such other and further relief as this Court deems just and proper.

Yours, etc.



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